

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

KATHLEEN M. JUNGCLAUS,

Plaintiff

v.

WAVERLY HEIGHTS, LTD.,

Defendant

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NO. 17-cv-04462-RK


Jury Trial Demanded

**DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

Pursuant to Fed. R. Civ. P. 56, Defendant, Waverly Heights, Ltd., by and through its attorneys, Eastburn and Gray, P.C., hereby moves this Honorable Court to enter summary judgment in favor of Defendant, Waverly Heights, Ltd., and against Plaintiff, Kathleen M. Jungclaus, for the reasons set forth in accompanying Memorandum of Law, incorporated herein by reference.

Respectfully Submitted,

**EASTBURN AND GRAY, P.C.**

By:   
Joanne D. Sommer  
Grace M. Deon  
Attorneys for Defendants

Dated: August 1, 2019

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